

**MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY
and CITY OF EVANSVILLE ENVIRONMENTAL
PROTECTION AGENCY**

Certificate of Operation

**Indiana Tube Corporation
2100 Lexington Avenue
Evansville, Indiana 47720**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 163-14073-00081	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 13, 2001 Expiration Date: June 13, 2006

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Evansville Environmental Protection Agency (Evansville EPA). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary plant operation of forming small diameter steel tubing into refrigerator condensers.

Authorized Individual: Terry Nonte
Source Address: 2100 Lexington Avenue, Evansville, Indiana 47720
Mailing Address: 2100 Lexington Avenue, Evansville, Indiana 47720
Phone Number: (812) 421-9028
SIC Code: 3317
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) powder coat line, identified as Paint Line #1 consisting of:
 - (1) One (1) 1.493 mmBtu/hr natural gas wash tank exhausting to stack #9, #10, #14; and
 - (2) One (1) 1.65 mmBtu/hr natural gas oven, exhausting to stack #11, #12 and #13.
 - (3) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess powder recycling.
- (b) One (1) powder coat line, identified as Paint Line #2 consisting of:
 - (1) One (1) 1.493 mmBtu/hr natural gas wash tank exhausting to stack #15, #16; and
 - (2) One (1) 1.65 mmBtu/hr natural gas oven, exhausting to stack #17.
 - (3) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess powder recycling.
- (c) One (1) 704 cubic feet per hour, natural gas-fired, inert gas generator, identified as inert gas producer #4 (GPI), installed on December 29, 1997. This unit collects emissions from natural gas combustion at the source.
- (d) One (1) 469 cubic feet per hour natural gas-fired inert gas generator, identified as inert gas producer #2 (GP2), installed in 1977.

- (e) One (1) 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits, installed in 1983 and vented with a pressure valve.
- (f) Three (3) Automatic Welders that attach steel structural wire to tubing and exhausts to stacks #7, #8 and #18.
- (g) One (1) mill, identified as Mill 3 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #4, #6 and #6A.
- (h) One (1) mill, identified as Mill 4 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #3, #3A, #5 and #5A.
- (i) One (1) mill, identified as Mill 5 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #1, #2 and #2A.
- (j) One (1) mill, identified as Mill 6 consisting of wash tank, welder, annealer, quench and anti-tarnish machine exhausting to stacks #3, and #6A.
- (k) One Lab hood exhausting to stack #17A.
- (l) One (1) rework test line consisting of one (1) dip tank with maximum mineral spirit usage of 2000 gallons per year.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term [326 IAC 2-6.1-7(a)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document is a minor source operating permit for this source and pursuant to 326 IAC 2-6.1 following shall be applicable:

- (a) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (b) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, Evansville EPA, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Local Agency Requirement

Pursuant to 326 IAC 2-6.1 (Minor Source Operating Permit), this document shall also become minor source operating permit and local operating permit.

B.8 Previous Permits Superseded by this approval

This MSOP supersedes the Registration issued to this source and all previous permits as follows:

- (a) Registration 163-7814-00081, issued on April 20, 1999. This Registration had previously superseded following permits:

- (a) IMOD 081-001-003, issued on April 23, 1998 by the Evansville EPA);
- (b) IMOD 081-001-001, issued on June 2, 1998 by the Evansville EPA; and
- (c) Exemption 163-9040-00081, issued on November 6, 1997 by the IDEM OAQ.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of any criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase the potential to emit of any criteria pollutant from the entire source above 100 ton per year or of single hazardous air pollutant (HAP) to above 10 tons per year or of combination of HAPs to above 25 tons per year, shall cause this source to be considered major under Part 70 Operating permit rules 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, Evansville EPA upon request and shall be subject to review and approval by IDEM, OAQ, Evansville EPA. IDEM, OAQ, Evansville EPA may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

City of Evansville Environmental Protection Agency
101 N.W. Martin Luther King Jr. Blvd. Rm 250
Evansville, IN 46402

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, Evansville EPA, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, Evansville EPA, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, Evansville EPA shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, Evansville EPA, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

City of Evansville Environmental Protection Agency
101 N.W. Martin Luther King Jr. Blvd. Rm 250
Evansville, IN 46402

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ Evansville EPA within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, Evansville EPA, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Evansville EPA or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and Evansville EPA, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must

comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- City of Evansville Environmental Protection Agency
101 N.W. Martin Luther King Jr. Blvd. Rm 250
Evansville, IN 46402
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, Evansville EPA on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, Evansville EPA may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, Evansville EPA representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

City of Evansville Environmental Protection Agency
101 N.W. Martin Luther King Jr. Blvd. Rm 250
Evansville, IN 46402

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, Evansville EPA on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality and Evansville EPA stating whether or not the source is in operation and in compliance with the terms and

conditions contained in this permit.

- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

City of Evansville Environmental Protection Agency
101 N.W. Martin Luther King Jr. Blvd. Rm 250
Evansville, IN 46402

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Evansville EPA on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

- (a) One (1) powder coat line, identified as Paint Line #1 consisting of:
 - (1) One (1) 1.493 mmBtu/hr natural gas wash tank exhausting to stack #9, #10, #14; and
 - (2) One (1) 1.65 mmBtu/hr natural gas oven, exhausting to stack #11, #12 and #13.
 - (c) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess powder recycling.
- (b) One (1) powder coat line, identified as Paint Line #2 consisting of:
 - (1) One (1) 1.493 mmBtu/hr natural gas wash tank exhausting to stack #15, #16; and
 - (2) One (1) 1.65 mmBtu/hr natural gas oven, exhausting to stack #17.
 - (3) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess powder recycling.
- (c) One (1) 704 cubic feet per hour, natural gas-fired, inert gas generator, identified as inert gas producer #4 (GPI), installed on December 29, 1997. This unit collects emissions from natural gas combustion at the source.
- (d) One (1) 469 cubic feet per hour natural gas-fired inert gas generator, identified as inert gas producer #2 (GP2), installed in 1977.
- (e) One (1) 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits, installed in 1983 and vented with a pressure valve.
- (f) Three (3) Automatic Welders that attach steel structural wire to tubing and exhausts to stacks #7, #8 and #18.
- (g) One (1) mill, identified as Mill 3 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #4, #6 and #6A.
- (h) One (1) mill, identified as Mill 4 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #3, #3A, #5 and #5A.
- (i) One (1) mill, identified as Mill 5 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #1, #2 and #2A.
- (j) One (1) mill, identified as Mill 6 consisting of wash tank, welder, annealer, quench and anti-tarnish machine exhausting to stacks #3, and #6A.
- (k) One Lab hood exhausting to stack #17A.
- (l) One (1) rework test line consisting of one (1) dip tank with maximum mineral spirit usage of 2000 gallons per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the welding operations shall not exceed an allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the powder coat paint booth shall not exceed 0.64 pounds per hour when operating at a process weight rate of 0.06 tons per hour.

This limit was calculated from the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Cold Cleaner Operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM or Evansville EPA, compliance with the PM limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There is no Compliance Monitoring Required.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.11 Record Keeping Requirements

- (a) The Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

The Permittee is not required to submit the records from the condition D.1.11. These records shall be maintained at the source for a period of 36 months and shall be made available to OAQ, IDEM or Evansville EPA to demonstrate compliance whenever requested by the agencies.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
City of Evansville Environmental Protection Agency**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Indiana Tube Corporation
Address:	2100 Lexington Avenue
City:	Evansville, Indiana 47720
Phone #:	(812) 424-9028
MSOP #:	163-14073-00081

I hereby certify that Indiana Tube Corporation is ☒ still in operation.
 ☒ no longer in operation.

I hereby certify that Indiana Tube Corporation is
 ☒ in compliance with the requirements of MSOP 163-14073-00081
 ☒ not in compliance with the requirements of MSOP 163-14073-00081.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____

INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: _____

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

City of Evansville Environmental Protection Agency

Addendum to the
Technical Support Document for Minor Source Operating Permit (MSOP)

Source Name: Indiana Tube Corporation
Source Location: 2100 Lexington Avenue, Evansville, Indiana 47720
County: Vanderburgh
SIC Code: 3317
Operation Permit No.: 163-14073-00081
Permit Reviewer: Gurinder Saini

On May 03, 2001, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Indiana Tube Corporation had applied for a Minor Source Operating Permit (MSOP) to operate process forming small diameter steel tubing into refrigerator condensers. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 11, 2001, Indiana Tube Corporation submitted comments on the proposed MSOP. The summary of the comments is as follows:

Comment 1:

The Source has requested to seek approval to construct and operate a "Rework Test line" consisting of 300 gallon mineral spirit dip tank with no stack. The annual mineral spirit usage for line will be less than 2000 gallons at 8760 hours of operation.

Response 1:

The maximum increase in the Potential to Emit because of this modification is less than one ton of VOC per year and there are no new State and Federal rule applicable to this source. There is no change in level of permit because of this modification. The condition A.2 and D.1 are modified as follows to reflect the new unit (language added is shown in **bold** and deleted in ~~strikeout~~):

- (I) **One (1) rework test line consisting of one (1) dip tank with maximum mineral spirit usage of 2000 gallons per year.**

Indiana Department of Environmental Management
Office of Air Quality
City of Evansville Environmental Protection Agency

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Indiana Tube Corporation
Source Location: 2100 Lexington Avenue, Evansville, Indiana 47720
County: Vanderburgh
SIC Code: 3317
Operation Permit No.: 163-14073-00081
Permit Reviewer: Gurinder Saini

The Office of Air Quality (OAQ) has reviewed an application from Indiana Tube Corporation relating to the construction and operation of forming small diameter steel tubing into refrigerator condensers.

History

On December 16, 1996, Indiana Tube Corporation submitted a Federally Enforceable Operating Permit (FESOP) application to the OAQ. After reviewing this application, the OAQ had issued a Registration to this source on April 20, 1999. It has been brought to the OAQ's attention that the Source has actual emissions above the threshold specified in 326 IAC 2-5.5 (Registration). Therefore, by issuing this approval, OAQ, IDEM is superceding the previously issued Registration and issue a Minor Source Operating Permit (MSOP) 163-14073-00081, which reflects the correct permit level for this source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices. These units are same as specified by the Permittee in the original permit application on December 16, 1996.

- (a) One (1) powder coat line, identified as Paint Line #1 consisting of:
 - (1) One (1) 1.493 MMBtu/hr natural gas wash tank exhausting to stack #9, #10, #14; and
 - (2) One (1) 1.65 MMBtu/hr natural gas oven, exhausting to stack #11, #12 and #13.
 - (3) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess powder recycling.
- (b) One (1) powder coat line, identified as Paint Line #2 consisting of:
 - (1) One (1) 1.493 mmBtu/hr natural gas wash tank exhausting to stack #15, #16; and
 - (2) One (1) 1.65 mmBtu/hr natural gas oven, exhausting to stack #17.
 - (3) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess

powder recycling.

- (c) One (1) 704 cubic feet per hour, natural gas-fired, inert gas generator, identified as inert gas producer #4 (GPI), installed on December 29, 1997. This unit collects emissions from natural gas combustion at the source.
- (d) One (1) 469 cubic feet per hour natural gas-fired inert gas generator, identified as inert gas producer #2 (GP2), installed in 1977.
- (e) One (1) 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits, installed in 1983 and vented with a pressure valve.
- (f) Three (3) Automatic Welders that attach steel structural wire to tubing and exhausts to stacks #7, #8 and #18.
- (g) One (1) mill, identified as Mill 3 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #4, #6 and #6A.
- (h) One (1) mill, identified as Mill 4 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #3, #3A, #5 and #5A.
- (i) One (1) mill, identified as Mill 5 consisting of wash tank, welder, annealer, quench, plating system and anti-tarnish machine exhausting to stacks #1, #2 and #2A.
- (j) One (1) mill, identified as Mill 6 consisting of wash tank, welder, annealer, quench, and anti-tarnish machine exhausting to stacks #3, and #6A.
- (k) One (1) lab hood exhausting to stack #17A.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

There are no new units added to this source since the submittal of permit application on December 16, 1996

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration 163-7814-00081, issued on April 20, 1999. This Registration had previously superseded following permits:
 - (a) IMOD 081-001-003, issued on April 23, 1998 by the Evansville EPA);
 - (b) IMOD 081-001-001, issued on June 2, 1998 by the Evansville EPA; and
 - (c) Exemption 163-9040-00081, issued on November 6, 1997 by the IDEM OAQ.

This permit supercedes the Registration permit mentioned above and all previous permits as well.

Enforcement Issue

There are no pending enforcement actions.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 16, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.@

Pollutant	Potential To Emit (tons/year)
PM	0.1
PM-10	0.4
SO ₂	-
VOC	40.3
CO	4.7
NO _x	5.6

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 25 and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1 and a Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit of any hazardous air pollutant (HAP) is less than 1 ton per year and a combination of HAPs is less than 2.5 tons per year. Therefore, this source is exempt from permitting for HAPs.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vanderburgh County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.1
PM10	0.4
SO ₂	-
VOC	40.3
CO	4.7
NO _x	5.6
Single HAP	-
Combination HAPs	-

- (a) This source was previously permitted as a Registration. It is now being reviewed as a new MSOP to correct applicability error.
- (b) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) The 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits is not subject to the New Source Performance Standards (NSPS) 326 IAC 12 and 40 CFR 60, Subpart Ka), based on the maximum capacity of the storage tank.
- (b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

The source is located in Vanderburgh County and is subject to 326 IAC 2-6 (Emissions Reporting), because the source emits more than ten (10) tons per year of VOC. Pursuant to this rule, the Permittee must annually submit an emission statement for the source. The annual emission statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Opacity Limitations)

This Source is located in German Township and not in city of Evansville. Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the limitations of 326 IAC 6-4 (Fugitive Dust Emissions). Therefore, the facility may not release fugitive particulate matter, which cross the property line of the source.

State Rule Applicability - Natural Gas Oven

The natural gas ovens are used to melt the powder paint onto condensers. Because the powder paint does not have VOCs, there are no VOC emissions. Because the ovens are natural gas-fired, there are negligible PM emissions. Therefore, the natural gas-fired oven does not have any applicable rules.

State Rule Applicability - Welding

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the welding operations shall not exceed an allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The welding operations are in compliance, based on capacity.

State Rule Applicability - Powder Coat Paint Booth

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the powder coat paint booth shall not exceed 0.64 pounds per hour when operating at a process weight rate of 0.06 tons per hour.

This limit was calculated from the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The powder coat paint booth is in compliance, based on capacity.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The powder coat paint booth, constructed in 1998, is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating), because the paint booths do not use VOC material for coating. Therefore, actual VOC emissions are less than 15 pounds per day.

State Rule Applicability – Anti Tarnish Units

326 IAC 8-3-2 (Cold Cleaner Operations)

The Anti Tarnish Units are subject to 326 IAC 8-3-2, because these operations are similar to degreasing operation. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Operation and Controls)

The Anti Tarnish Units are not subject to 326 IAC 8-3-5, because these units have remote solvent reservoirs.

Compliance Monitoring

This Powder coating lines have actual PM emissions less than 25 tons per year and they do not have any control device. Therefore, these lines are not subject to any compliance monitoring.

Conclusion

The construction and operation of this forming small diameter steel tubing shall be subject to the conditions of the attached proposed Minor Source Operating Permit 163-14073-00081.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Inert gas generator, Paint line ovens, Wash tank****Company Name: Indiana Tube Corporation****Address City IN Zip: 2100 Lexington Avenue, Evansville, Indiana 47720****CP: 163-14073****Plt ID: 163-00081****Reviewer: GS****Date: March 15, 2001**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

12.8

112.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	5.6	0.3	4.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Mineral Spirit Usage in the Anti Tarnish Units

Page 2 of 2 TSD App A

Company Name: Indiana Tube Corporation
Address City IN Zip: 2100 Lexington Avenue, Evansville, Indiana 47720
CP: 163-14073
Pit ID: 163-00081
Reviewer: GS
Date: March 26, 2001

Mineral Spirit Usage	
Anti Tarnish Units in	Usage (tons per year)
Mill 3	10
Mill4	10
Mill 5	10
Mill 6	10
Total PTE of VOC	40